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3 Eastern District of Washington
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8 Telephone: (509) 353-2767

9 UNITED STATES DISTRICT
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

4:15-CR-6049-EFS

14 SECOND SUPERSEDING
15 INDICTMENT

16 Vio: 21 U.S.C. § 846
17 Conspiracy to Distribute 500
18 Grams or More of a Mixture or
19 Substance Containing a
20 Detectable Amount of
21 Methamphetamine, 5 Kilograms
22 or More of Cocaine, 1 Kilogram
23 or More of Heroin and 400 grams
24 or More of N-phenyl-N
25 Propanamide
26 (Count 1)

27 Vio: 18 U.S.C. § 1956(h)
28 Conspiracy to Commit Money
Laundering (Count 2)

Vio: 21 U.S.C. § 841(a)(1),
(b)(1)(A)(ii)
Possession with the Intent to
Distribute 5 Kilograms or more of
Cocaine (Count 3)

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED],
5 MIGUEL REYES GARCIA,
6 [REDACTED]
7 [REDACTED],
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10 Defendants.
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Vio: 18 U.S.C. § 1956(a)(1)(B)(i)
Money Laundering
(Counts 4, 5, 6, 7, 10, 11, 12, 14)

Vio: 21 U.S.C. § 841(a)(1),
(b)(1)(A)(viii)
Possession with the Intent to
Distribute 50 grams or more of
Actual Methamphetamine
(Count 8)

Vio: 18 U.S.C. 1956(a)(1)(B)(i)
International Money Laundering
(Counts 9, 13)

Vio: 21 U.S.C. § 841(a)(1),
(b)(1)(A)(i), (vi)
Possession with the Intent to
Distribute 1 Kilogram or More of
a Mixture or Substance
Containing Heroin and
400 grams or More of a Mixture
or Substance Containing N-
phenyl-N Propanamide
(Count 15)

Notice of Criminal Forfeiture
Allegations

The Grand Jury Charges:

COUNT ONE

Beginning on a date unknown but by on or about January 2010 continuing
until on or about December 6, 2016, in the Eastern District of Washington and
elsewhere, the Defendants, [REDACTED]

SECOND SUPERSEDING INDICTMENT – 2

Second Superseding.Indictment.docx

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED], MIGUEL REYES GARCIA, [REDACTED]
[REDACTED]

did knowingly and intentionally combine, conspire, confederate and agree together with each other and other persons, both known and unknown to the Grand Jury, to commit the following offense against the United States, to wit: distribution of 500 grams or more of a mixture or substance containing a detectable amount of Methamphetamine, 5 kilograms or more of a mixture or substance containing a detectable amount of Cocaine, 1 kilograms or more of a mixture or substance containing a detectable amount of heroin and 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N Propanamide, all Schedule II controlled substances, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(i), (ii)(I), (vi), and (viii); all in violation of 21 U.S.C. § 846.

SECOND SUPERSEDING INDICTMENT – 3

Second Superseding Indictment.docx

COUNT TWO

[REDACTED]

(1956(a)(1))

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

(1956(a)(2))

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

COUNT THREE

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

COUNT FOUR

[REDACTED]

COUNT FIVE

[REDACTED]

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16
17 **COUNT SIX**
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED]
28 [REDACTED]

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]

COUNT SEVEN

12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED]
28 [REDACTED]

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]

5 **COUNT EIGHT**

6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]

14 **COUNT NINE**

15 [REDACTED]
16 [REDACTED],
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED],
28 [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

COUNT TEN

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

COUNT ELEVEN

[REDACTED]

COUNT TWELVE

[REDACTED],

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]

COUNT THIRTEEN

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17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED]
28 [REDACTED],

[illegible]

COUNT FIFTEEN

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

The allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 21 U.S.C. § 853, upon conviction of an offense of violation of 21 U.S.C. § 846, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 [REDACTED],
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED] and, shall forfeit to the United
10 States of America, any property constituting, or derived from, any proceeds
11 obtained, directly or indirectly, as the result of such offense(s) and any property
12 used or intended to be used, in any manner or part, to commit or to facilitate the
13 commission of the offense(s).
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17 If any forfeitable property, as a result of any act or omission of the
18 Defendants:
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- 20 (a) cannot be located upon the exercise of due diligence;
21 (b) has been transferred or sold to, or deposited with, a third party;
22 (c) has been placed beyond the jurisdiction of the court;
23 (d) has been substantially diminished in value; or
24 (e) has been commingled with other property which cannot be divided
25 without difficulty;
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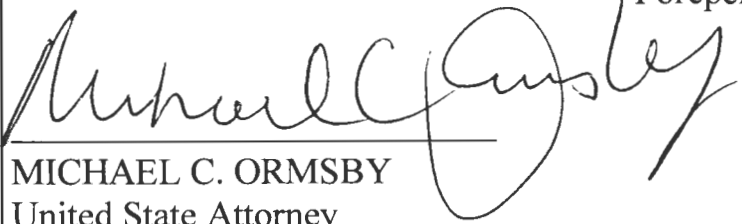
1 the United States of America shall be entitled to forfeiture of substitute property
2 pursuant to 21 U.S.C. § 853(p).
3

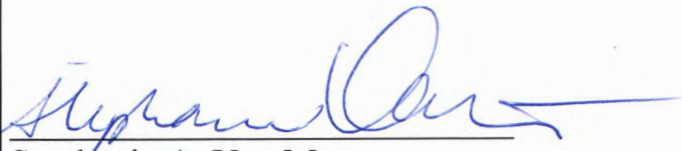
4 DATED this ____ day of December 2016.
5

6 A TRUE BILL

7 [REDACTED]
8

9 Foreperson

10 
11
12 MICHAEL C. ORMSBY
13 United State Attorney

14 
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16 Stephanie A. Van Marter
17 Assistant United States Attorney
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